

DE VRIES LAW, P.C.
100 Pine Street, #1250
San Francisco, CA 94111

Darren J. Kessler, SBN 114986
KESSLER LAW OFFICE
3060 El Cerrito Plaza, Suite 371
El Cerrito, CA 94530
Tel: (510) 524-7750
E-Mail: darren.j.kessler@gmail.com

Lizabeth N. de Vries, SBN 227215
Kelly K. Dixon, SBN 191078
DE VRIES LAW, P.C.
100 Pine Street, Suite 1250
San Francisco, CA 94111
Tel: (415) 909-4009 // Fax: (628) 280-6514
E-Mail: liza@devrieslawsf.com

Attorneys for Plaintiff J.P. by and through his
Guardian *ad litem*, Shannon Villanueva

UNITED STATES DISTRICT COURT

NORTHERN DISTRICT OF CALIFORNIA — OAKLAND

J.P., by and through his Guardian Ad Litem,
SHANNON VILLANUEVA,

Plaintiff,

v.

COUNTY OF ALAMEDA, DIANE DAVIS
MAAS, SUE MAY, TRIAD FAMILY
SERVICES, MARIA REFUGIO MOORE, and
Does 1-30 inclusive,

Defendants.

Case No.: 3:17-cv-5679-LB

**STIPLUATION AND ~~[PROPOSED]~~
ORDER CONTINUING CASE-
MANAGEMENT SET BY DKT 203**

Complaint Filed: October 2, 2017
Trial Date: November 7, 2022
Status: SETTLED

Plaintiffs J.P., by and through his Guardian Ad Litem, Shannon Villanueva (“Plaintiff”) and
Defendants COUNTY OF ALAMEDA and TRIAD FAMILY SERVICES (collectively
“Defendants”), jointly submit this Stipulation and [Proposed] Order.

The parties are meeting and conferring to finalize language in a Settlement Agreement while
the plaintiff continues to work with Medi-Cal to attempt to acquire a final lien amount. Plaintiff
continues to work with supervising staff at Medi-Cal, who continue to demand additional
information and confirmation from J.P.’s care team, to acquire the final lien amount in the next two
weeks and hope to obtain the final lien amount shortly. But with the holidays, it may be prudent to

estimate this process may not be complete before December. The parties anticipate finalizing the Settlement Agreement and drafting the Petition for Minor's Compromise within 30 days once the Medi-Cal lien issue is resolved.

In addition, Jody Struck, counsel for Defendant County of Alameda will be attending a Mandatory Settlement Conference beginning at 10:00 a.m. on December 1, 2022 with Judge Ryu. The Mandatory Settlement Conference was set before the further Case Management Conference in this case, but the parties were hopeful all issues would be resolved prior to December 1, 2022, thus avoiding the scheduling conflict.

Although progress has been made, the parties now diligently and jointly request, based on good cause, that this Court continue the December 1, 2022 Case Management Conference to early 2023 to allow the parties sufficient time to acquire the lien amount from Medi-Cal which will then allow parties to finalize the Settlement Agreement and move forward in drafting the Petition for Minor's Compromise. The parties greatly appreciate the Court's assistance in this matter.

IT IS SO STIPULATED AND REQUESTED.

Respectfully Submitted,
MATHENY SEARS LINKERT JAIME, LLP

By:

Date: _____

/s/ Ronald E. Enabnit
Ronald E. Enabnit,
Attorney for Defendant
TRIAD FAMILY SERVICES

HAAPALA, THOMPSON & ABERN, LLP

By:

Date: _____

/s/ Jody Struck
Jody Struck
Attorney for Defendants
COUNTY OF ALAMEDA

DE VRIES LAW, P.C.
100 Pine Street, #1250
San Francisco, CA 94111

KESSLER LAW OFFICE

Date: _____

By: /s/ Darren J. Kessler

Darren J. Kessler
Attorney for Plaintiff J.P., by and through
his GAL, SHANNON VILLANUEVA

DE VRIES LAW, P.C.

Date: _____

By: /s/ Lizabeth N. de Vries

Lizabeth N. de Vries
Attorney for Plaintiff J.P. by and through his
GAL, SHANNON VILLANUEVA

ELECTRONIC CASE FILING ATTESTATION

I, Lizabeth N. de Vries, am the ECF user whose identification and password are being used to file the foregoing documents. Pursuant to Civil Local rule 5.1(i), I hereby attest that concurrence in the filing of these documents has been obtained from each of its signatories.

DE VRIES LAW, P.C.

Date: _____

By: /s/ Lizabeth N. de Vries

Lizabeth N. de Vries
Attorney for Plaintiff J.P. by and through his
GAL, SHANNON VILLANUEVA

[PROPOSED] ORDER

Having considered the stipulation of the parties and good cause appearing, the case-management previously set by DKT 203 for December 1, 2022 at 9:30 a.m. is hereby continued to January 26, 2023 at 9:30 a.m./~~p.m.~~ Case Management Statements due January 19, 2023.

IT IS SO ORDERED.

Date: November 18, 2022



Honorable Laurel Beeler
United States District Court Judge

DE VRIES LAW, P.C.
100 Pine Street, #1250
San Francisco, CA 94111